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14 Attorneys for Defendants James E. Tilton;
 15 Michael C. Genest; John Chiang; Louis Debarraicua,
 M.D.; Filadelfo Valasquez Oandasan Jr., M.D.; Claude
 16 Finn; and Sambrajya Lakshmi Palagummi, M.D.

17 IN THE UNITED STATES DISTRICT COURT
 18 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 19 SAN FRANCISCO DIVISION

20 DONALD R. RODRIGUEZ,

21 Plaintiff,

22 v.

23 JAMES E. TILTON; MICHAEL C. GENEST;
 24 JOHN CHIANG; CLAUDE FINN; LOUIS
 DEBARRAICUA, M.D.; FILADELFO
 25 VALASQUEZ OANDASAN JR., M.D.;
 26 SAMBRAJYA LAKSHMI PALAGUMMI,
 M.D.; and DOES 1-100

27 Defendants

CIVIL NO: C-08-05390 MMC

**ADMINISTRATIVE MOTION AND
 STIPULATION FOR ORDER
 EXTENDING DISCOVERY CUT-OFF;
 [Proposed] ORDER**

Date:

Time:....9:00 a.m.

Judge: Hon. Maxine M. Chesney

Place: Courtroom 7, 19th Floor

Case Filed: December 1, 2008

Trial Date: October 17, 2011

1 IT IS HEREBY STIPULATED by and between the parties to this action, by and through
2 their respective counsel of record, as follows:

3 WHEREAS the deadline for completion of fact discovery is currently set for Wednesday, March
4 30, 2011.

5 WHEREAS Plaintiff Donald R. Rodriguez has been out of contact and, as a result,
6 Plaintiff's counsel has been unable to comply with certain pending discovery requests, including
7 the deposition of Plaintiff, which had been noticed for March 21, 2011.

8 WHEREAS Plaintiff's counsel has made and is making efforts to reestablish contact with
9 the Plaintiff.

10 WHEREAS both sides believe that good cause exists to extend the discovery cut-off by 30
11 days to provide Plaintiff's counsel sufficient time to establish contact with the Plaintiff and
12 comply with Plaintiff's discovery obligations.

13 THEREFORE THE PARTIES HEREBY JOINTLY AND RESPECTFULLY HEREBY
14 REQUEST that the Court extend the deadline for completion of fact discovery by 30 days, to
15 April 29, 2011.

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DATED: March 29, 2011

Respectfully submitted,
COVINGTON & BURLING LLP

By: /s/ Matthew J. Hawkinson
MATTHEW J. HAWKINSON

Attorneys for Plaintiff
DONALD R. RODRIGUEZ

DATED: March 29, 2011

KAMALA D. HARRIS
Attorney General for the State of California

By /s/ Tom Blake
TOM BLAKE

Attorneys for Defendants
James E. Tilton; Michael C. Genest;
John Chiang; Louis Debarraicua, M.D.;
Filadelfo Valasquez Oandasan Jr., M.D.; Claude
Finn; and Sambrajya Lakshmi Palagummi, M.D.


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~~[Proposed]~~ ORDER

completion
Good cause appearing, it is hereby ordered that the deadline for ~~complete~~ of fact discovery in
this matter be continued until April 29, 2011, provided such continuance shall not, by itself,
constitute good cause to continue any other deadline or date.

IT IS SO ORDERED.

Dated: April 1, 2011

By 
MAXINE M. CHESNEY
United States District Judge

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